

EXHIBIT 16

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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

- - -

KATHLEEN MOLLER,

:

:

Plaintiff,

:

:

vs.

:

Case No. 24-0228-WBV-DPC

:

MARTIAN SALES, INC.;

:

JOPEN, LLC, a Texas

:

limited liability

:

company; JOHNSON FOODS,

:

LLC, a Wyoming limited

:

liability company; CAG

:

HOLDINGS, LLC, a Wyoming:

limited liability

:

company; RMH HOLDINGS,

:

INC., a Wyoming

:

corporation, et al.,

:

:

Defendants.

:

- - -

REMOTE VIDEOTAPED DEPOSITION OF

EDWARD W. BOYER, M.D., Ph.D.

- - -

Tuesday, February 17, 2026

at 10:03 a.m.

- - -

REPORTED BY: CAROL A. KIRK, CSR-9139

Job No. MDLG7836483

1 A. I think -- I know I've seen it in
2 the lay press, but I don't know that I've seen
3 that in a scientific publication other than a very
4 early one.

5 Q. Have you seen publications
6 indicating that 7-hydroxymitragynine is 30 times
7 more powerful than morphine?

8 A. I don't know that I've seen 30.
9 I mean, I know that I've seen 10, 13. I don't
10 know if I've seen anything in the 30s. I don't
11 know if I've seen anything in the 20s. But
12 I think I've seen a 40 out there.

13 Q. 40. Okay.
14 Do you disagree with any of those?

15 A. I mean, no. Binding affinity is
16 what binding affinity is, but that's not the
17 measure of pharmacologic activity.

18 Q. What do you mean by that exactly?
19 So what is binding affinity? What is binding
20 affinity? Let's start there.

21 A. How well it binds to the receptor.

22 Q. And how is -- explain this for the
23 jury. So if something has a high binding
24 affinity -- well, strike that.

25 What is the difference between

1 news. Would more 7-hydroxymitragynine be bad
2 news?

3 MS. PAYTON: Object to the form.

4 A. I'm speaking as a chemist. Chemists
5 like to have no conversion happen at all once you
6 make a molecule; otherwise, you have to go back
7 and make it again.

8 Q. What is the maximum safe dose known
9 for mitragynine?

10 A. I don't know that there are any
11 publications that define a maximum safe dose, but
12 what I do know is that the concentration of
13 mitragynine found in Ms. Moller's blood was
14 insufficient to cause adverse effects.

15 Q. That wasn't my question.

16 My question was whether or not you
17 know the maximum safe dose for mitragynine.

18 MS. PAYTON: Object to the form.

19 A. I think I answered it pretty
20 directly. I'm going to stick with my previous
21 answer.

22 Q. So you're not aware of a maximum
23 safe dose in the literature?

24 MS. PAYTON: Object to the form.

25 A. I'm going to stick with my previous

1 answer.

2 Q. Are you aware of a maximum safe dose
3 for mitragynine in the literature?

4 MS. PAYTON: Object to the form.

5 A. I don't know that a maximum dose of
6 mitragynine has ever been defined, but what I can
7 say with confidence is that the amount of
8 mitragynine found in Ms. Moller's blood did not
9 cause any toxicity.

10 MR. COWGILL: And I'll move to
11 strike that portion of your answer as
12 nonresponsive.

13 BY MR. COWGILL:

14 Q. Do you know the maximum safe dose
15 for 7-hydroxymitragynine?

16 MS. PAYTON: Object to the form of
17 the question.

18 A. I know that no maximum safe dose has
19 been defined, but what I know is that Harmony
20 Moller's concentration of mitragynine, even at
21 158 nanograms per mL, was insufficient to cause
22 toxicity.

23 MR. COWGILL: I'll move to strike
24 your answer as nonresponsive.

25